BOOK 10 PAGE 45U

"BILL OF COMPLAINT"

IRA F. JUNES, UNMARKIED, LUTHER E. JUNES AND INA M. JUNES, HIS WIFE, NO. / EQUITY

IN THE CIRCUIT COURT FOR

COMPLAINANTS

FREDERICK COUNTY, SITTING AS

VS.

A COURT OF EQUITY.

SAMUEL C. JONES AND CHRISTIE
V. JONES, HIS WIFE, DANIEL L.
JONES, UNMARRIED, AND ELMER E.
JUNES, UNMARRIED,
DEFENDANTS

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Your Complainants, Ira F. Jones, Luther E. Jones and Ina M. Jones, his wife, by w. Jerome Offutt, their Solicitor, respectfully shows unto your Honorable Court:

died intestate on or about the 23rd day of January, 1955, seized and possessed of certain real estate, situate, lying and being in Burkittsville, Frederick County, Maryland, and containing 36 perches of land, more or less, said real estate being described in a deed from I. Mary Staley, unmarried, to Huffer J. Ahalt and Rosa A. Ahalt, his wife, said deed being dated the 8th day of October, 1947, and duly recorded in Liber No. 466, folio 25, etc., one of the Land Records of Frederick County, Maryland, a duly certified copy of said deed marked "Exhibit A" being herewith filed as part hereof.

SECOND: That the said Huffer j. Ahalt departed this life on or about the 27th day of June , 1949, leaving the said Rosa A. Ahalt surviving him and in whom title to the aforesaid real estate vested in fee simple.

THIRD: That the said Rosa A. Ahalt being so seized and possessed of said real estate, left surviving her the following children as her heirs at law and next of kin and to whom, the said land has descended, viz:

- (a) Your complainant, Ira F. Jones, a son of said Rosa A. Ahalt, unmarried, and residing at 324 East Franklin Street, Hagerstown, Maryland.
- (b) Your Complainant, Luther L. Jones, a son of said Rosa A. Ahalt, who intermarried with your Complainant, Ina M. Jones, both residing at R. F. D. 1, Thomasville, Pennsylvania.

W. JEROME OFFUTT
ATTORNEY AT LAW
FREDERICK, MD.